

UNITED STATES OF AMERICA
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Mail Classification Schedule Change
Certificate of Mailing
International Certificate of Mailing Service

Docket No. MC2012-24

PUBLIC REPRESENTATIVE COMMENTS
ON POSTAL SERVICE NOTICE
OF MINOR CLASSIFICATION CHANGE

(May 29, 2012)

The Public Representative hereby provides comments pursuant to Order No. 1350.¹ In that Order the Commission established the above referenced docket to receive comments from interested persons, including the undersigned Public Representative, on a Postal Service notice of minor classification changes concerning the market dominant special services Certificate of Mailing and International Certificate of Mailing and the competitive service International Certificate of Mailing.²

The Postal Service proposes to modify the Mail Classification Schedule (MCS) to allow customers to use the permit imprint method of postage payment when purchasing the Certificate of Mailing and International Certificate of Mailing services for their bulk mailings. Currently, the MCS does not list permit imprint as a postage payment method for such services purchased at bulk prices. Instead of adding permit imprint to the existing list of acceptable payment methods, the Postal Service proposes to eliminate any reference to payment methods in the MCS for the Certificate of Mailing and International Certificate of Mailing services. Notice at 1. This change has the effect of permitting all postage payment methods, including permit imprint, to be used to purchase these services at bulk prices.

¹ PRC Order No. 1350, Notice and Order Concerning Classification Change, May 22, 2012.

² Notice of the United States Postal Service of Minor Classification Changes Related to Certificate of Mailing and International Certificate of Mailing Services, May 18, 2012 (Notice).

The Postal Service also proposes to modify the MCS to clarify that bulk prices, unlike individual-piece prices, are only applicable to identical-weight pieces. *Id.* at 1. In addition, the Postal Service proposes to amend the MCS to include Parcel Return Service and Parcel Select, including Parcel Select Lightweight, among the list of products and services that may be used in conjunction with the Certificate of Mailing service. *Id.* at 2.

The Public Representative considers the Postal Service's proposed classification changes to be not inconsistent with 39 U.S.C. §3642. For the Certificate of Mailing and International Certificate of Mailing services, the proposed changes expand the number of postage payment methods available to customers and clarify the applicability of bulk prices and, for the Certificate of Mailing service, increase the number of products that may be used with that service. Consequently, the proposed changes are truly minor in nature and appropriate for notice pursuant to 39 C.F.R. §§ 3020.90 and 3020.91. Sections 3020.90 and 3020.91 permit the Postal Service to initiate changes to the MCS that do not constitute a proposal to modify either the market dominant or competitive product list. 39 C.F.R. § 3020.91.

The Public Representative respectfully submits the foregoing comments for the Commission's consideration.

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